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May 10, 2021

VIA ECF and E-Mail

The Honorable Vernon S. Broderick
United States District Court
for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, New York 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 5/11/2021

Re: *Spectrum Dynamics Medical Limited v. General Electric Company, et al.,*
Civil Action No. 18-cv-11386 (VSB)

Dear Judge Broderick:

We represent Plaintiff Spectrum Dynamics Medical Limited (“Plaintiff” or “Spectrum”) in the above-referenced action. On behalf of Plaintiff, we write pursuant to Rule 5.B of your Honor’s Individual Rules & Practices in Civil Cases to respectfully request permission to file Plaintiff Spectrum Dynamics Medical Limited’s Memorandum Of Law In Support Of Its Claim Construction Brief Responding To Defendant GE’s Opening Claim Construction Brief [D.I. 224] (“Spectrum Claim Construction Brief”), Exhibits 2-3 to the accompanying Declaration of P. Branko Pejic, and Exhibits C & F of the accompanying Declaration of Dan Inbar under seal and in redacted form.

Plaintiff requests redactions are limited to information designated as “Highly Confidential – Attorneys’ Eyes Only” by the respective parties under the Stipulated Confidentiality and Protective Order [D.I. 156]. Additionally, Plaintiff requests leave to file Exhibits 2-3 of the Declaration of P. Branko Pejic, and Exhibits C & F of the Declaration of Dan Inbar under seal in their entirety because the Exhibits contain information designated as “Highly

Confidential – Attorneys’ Eyes Only” by the respective parties under the Stipulated Confidentiality and Protective Order [D.I. 156].

Plaintiff’s counsel has conferred with Defendants’ counsel who does not object to Plaintiff filing under seal relevant information relating to Spectrum’s Invalidity Contentions or Defendants’ Highly Confidential Information.

For the aforementioned reasons, Plaintiff respectfully requests permission from this Court to file Spectrum Claim Construction Brief, Exhibits 2-3 to the Declaration of P. Branko Pejic, and Exhibits C & F to the Declaration of Dan Inbar under seal and in redacted form.

Respectfully submitted,

/s/ Neil F. Greenblum

Neil F. Greenblum

cc: All counsel of record (via email and ECF)